

# Frankfurt Kurnit Klein + Selz PC

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April 21, 2017

**VIA ECF**

The Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, New York 10007

RE: Laspatha DeCaro Studio Corp. v. Rimowa GmbH, et al., No. 16-cv-0934

Dear Judge Schofield:

We represent plaintiff Laspatha DeCaro Studio Corporation (“LD” or “Plaintiff”) in the above-captioned matter. Pursuant to the Third Amended Civil Case Management Plan and Scheduling Order [Dkt. No. 105] (“Scheduling Order”), Plaintiff and defendants Rimowa GmbH, Rimowa Distribution Inc., and Rimowa Inc. (together “Rimowa”), Meiré GmbH & Co. KG d/b/a Meiré and Meiré (“Meiré”) and Shotview Berlin Photographers Management GmbH d/b/a Shotview Artists Management (“Shotview”) respectfully submit the following joint status letter.

Following the February 27, 2017 telephonic status conference with the Court and the issuance of the Scheduling Order, the parties have moved ahead with fact discovery. The parties exchanged initial disclosures on March 8, 2017, and document requests and interrogatories on March 10, 2017. Following a brief agreed-upon extension, all parties exchanged their respective responses and objections to the pending discovery requests on April 18, 2017. The parties are working to collect documents and comply fully with the German and European Union regulations associated with those collections, intend to promptly begin rolling productions of responsive documents and, to the extent necessary, meet and confer to address any discovery issues that may arise during this process.

Other than Meiré’s pending motion to dismiss, no other motions are currently pending before this Court.

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Counsel for LD, Rimowa, Meiré, and Shotview are available at the Court's convenience to discuss any of the matters discussed above.

Respectfully Submitted,  
**Frankfurt Kurnit Klein & Selz P.C.**

*/s/ Andrew J. Ungberg*

Andrew J. Ungberg  
Maura J. Wogan

Lily Landsman-Roos

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Studio Corporation*

Cc: All attorneys of record (via ECF)